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March 15, 2006

#### BY HAND DELIVERY

The Honorable Sue L. Robinson United States District Court 844 N. King Street Wilmington, DE 19801

Re:

Teleglobe Communications Corporation, et al. v. BCE Inc., et al.

C.A. No. 04-CV-1266

### Dear Chief Judge Robinson:

We write in connection with the Defendants' Objection, pursuant to Fed. R. Civ. P. 53, to the Special Master's Final Decision on Plaintiffs' Motion to Compel Defendants to Produce Documents Withheld on the Basis of Privilege (the "Decision"). We respectfully request that the Court review in camera the attached documents that were the subject of the Decision and are referenced in the Declarations of Martine Turcotte (Docket No. 227) and Mark Shapiro (Docket No. 226). The Defendants believe that these documents will aid the Court in its review and understanding of the Decision, BCE's Objections to the Special Master's Final Decision on Plaintiffs' Motion to Compel Defendants to Produce Documents Withheld on the Basis of Privilege (the "BCE Objection") (Docket No. 228) and the Declarations of Martine Turcotte and Mark Shapiro filed in support of the BCE Objection. For the Court's convenience, we have included with this letter an index of the documents attached hereto.

Respectfully,

Pauline K. Morgan

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YOUNG CONAWAY STARGATT & TAYLOR, LLP

The Honorable Sue L. Robinson March 15, 2006 Page 2

PKM:mbw Attachments

cc: Joseph Rosenthal, Esq. (w/o attachments, by Hand Delivery)

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## **INDEX OF ATTACHMENTS**

Attachment to March 15, 2006 Letter	Description	Special Master's 2.22.06 Decision Reference	Declaration Reference
Attachment 1	7/04 Privilege Log, Doc. No. 222, April 23, 2002 "Teleglobe Legal Review" presentation	Page 33, n. 25*	Turcotte Decl. ¶¶ 5-7, 12
Attachment 2	7/04 Privilege Log, Doc. No. 725, April 12, 2002 presentation to Jean Monty	Page 33, n. 27*	Turcotte Decl. ¶¶ 8-10
Attachment 3	9/05 Privilege Log, Doc. No. 1056, excerpts from draft presentation	Page 33, n. 26	Turcotte Decl. page 3, n. 2
Attachment 4	9/05 Privilege Log, Doc. No. 278, April 3, 2002 draft memorandum	Page 42, n. 42	Shapiro Decl. ¶¶ 4-5
Attachment 5	9/05 Privilege Log, Doc. No. 5125, April 3, 2002 draft memorandum	Page 42, n. 42	Shapiro Decl. ¶¶ 4-5
Attachment 6	9/05 Privilege Log, Doc. No. 281, April 3, 2002 draft bullet points	Page 42, n. 43	Shapiro Decl. ¶¶ 4-6
Attachment 7	9/05 Privilege Log, Doc. No. 5124, April 3, 2002 draft bullet points	Page 42, n. 43	Shapiro Decl. ¶¶ 4-6
Attachment 8	7/04 Privilege Log, Doc. No. 700, April 10, 2002 e-mail	Page 42, n. 44	Shapiro Decl. ¶ 4, 7
Attachment 9	7/04 Privilege Log, Doc. No. 213, draft addressing options available to Teleglobe, Inc.	Page 42, n. 45	Shapiro Decl. ¶ 4, 7
Attachment 10	7/04 Privilege Log, Doc. No. 496, April 16, 2002 draft memorandum	Page 43, n. 46	Shapiro Decl. ¶ 4, 8

<sup>\*</sup> Indicates the first document referenced in the footnote; the "see also" documents subsequently cited in the footnote are substantially similar.